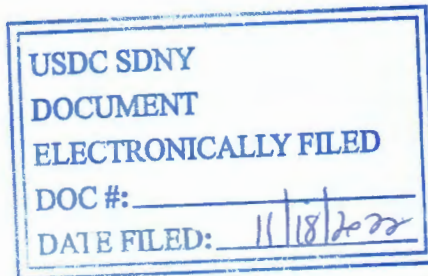


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November 18, 2022

MEMO ENDORSED

By ECF Filing

Hon. Colleen McMahon
United States District Court
for the Southern District of New York
500 Pearl Street
New York, NY 10007

Granted bail modification
request for Mr. Gipson to
travel to Boston.

Re: *United States v. Arthur Gipson*
Docket No. 20 Cr. 521 (SDNY)

Colleen McMahon
11/18/2022

Dear Judge McMahon:

I represent the defendant Arthur Gipson in the above-referenced matter. I write without objection from the Government to request a bail modification so as to extend Mr. Gipson's bail limits to include Boston and points in between so that Mr. Gipson may travel to Boston to visit with his son. On Wednesday evening, Mr. Gipson's son, who resides in Boston, was admitted to Beth Israel Hospital in Boston with appendicitis and may require surgery in the coming days.

At his presentment and arraignment on October 1, 2020, bail for Mr. Gipson was fixed in the amount of a \$250,000 PRB co-signed by one financially responsible person (Mr. Gipson's wife) and secured by his home, travel restricted to the EDNY and SDNY, pretrial services supervision and surrender of any travel documents, along with the usual conditions barring contact with co-defendants and possession of any firearms. All of these bail conditions have been satisfied and Mr. Gipson has been in full compliance with all of the conditions of his release.

Mr. Gipson would like to have his bail limits extended to include Boston and points in between so that he may visit his son. AUSA Jason Swergold has advised me that the Government has no objection to the bail modification requested. Pretrial Services Officer Madalyn Toledo has advised me that Pretrial Services takes no position regarding the bail

Honorable Colleen McMahon

2

November 18, 2022

modification requested and has authorized me to state that Mr. Gipson has been in full compliance with the conditions of his bail.

Thank you for the Your Honor's consideration of this request.

Respectfully submitted,

/s/

John F. Kaley

cc: AUSA Jason Swergold
Pretrial Services Officer Madalyn Toledo
(both via ECF filing)